



# UNITED STATES DISTRICT COURT

for the

Eastern District of Wisconsin

Civil Division

D. Bryce Davis

Case No. **20-C-1146**

(to be filled in by the Clerk's Office)

Plaintiff(s)

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

-v-

The Department of the Navy

Defendant(s)

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

## COMPLAINT FOR A CIVIL CASE ALLEGING NEGLIGENCE

(28 U.S.C. § 1332; Diversity of Citizenship)

### I. The Parties to This Complaint

#### A. The Plaintiff(s)

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name	D. Bryce Davis
Street Address	3338 West Ranch Rd.
City and County	Mequon, Ozaukee County
State and Zip Code	Wisconsin, 53092
Telephone Number	262-202-6454
E-mail Address	feminist.justice@outlook.com

#### B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known). Attach additional pages if needed.

**Defendant No. 1**

Name	The Department of the Navy
Job or Title <i>(if known)</i>	FOIA Public Liaisons
Street Address	2000 Navy Pentagon
City and County	Washington
State and Zip Code	Washington, DC 20350-1000
Telephone Number	
E-mail Address <i>(if known)</i>	

**Defendant No. 2**

Name	
Job or Title <i>(if known)</i>	
Street Address	
City and County	
State and Zip Code	
Telephone Number	
E-mail Address <i>(if known)</i>	

**Defendant No. 3**

Name	
Job or Title <i>(if known)</i>	
Street Address	
City and County	
State and Zip Code	
Telephone Number	
E-mail Address <i>(if known)</i>	

**Defendant No. 4**

Name	
Job or Title <i>(if known)</i>	
Street Address	
City and County	
State and Zip Code	
Telephone Number	
E-mail Address <i>(if known)</i>	

**II. Basis for Jurisdiction**

Federal courts are courts of limited jurisdiction (limited power). Under 28 U.S.C. § 1332, federal courts may hear cases in which a citizen of one State sues a citizen of another State or nation and the amount at stake is more than \$75,000. In that kind of case, called a diversity of citizenship case, no defendant may be a citizen of the same State as any plaintiff. Explain how these jurisdictional requirements have been met.

**A. The Plaintiff(s)**

1. If the plaintiff is an individual

The plaintiff, (name) D. Bryce Davis, is a citizen of the  
State of (name) Mequon, Wisconsin.

2. If the plaintiff is a corporation

The plaintiff, (name) \_\_\_\_\_, is incorporated  
under the laws of the State of (name) \_\_\_\_\_,  
and has its principal place of business in the State of (name) \_\_\_\_\_.

*(If more than one plaintiff is named in the complaint, attach an additional page providing the same information for each additional plaintiff.)*

**B. The Defendant(s)**

1. If the defendant is an individual

The defendant, (name) United States Navy, is a citizen of  
the State of (name) Washington, DC. Or is a citizen of  
(foreign nation) \_\_\_\_\_.

2. If the defendant is a corporation

The defendant, (name) \_\_\_\_\_, is incorporated under  
the laws of the State of (name) \_\_\_\_\_, and has its  
principal place of business in the State of (name) \_\_\_\_\_.  
Or is incorporated under the laws of (foreign nation) \_\_\_\_\_,  
and has its principal place of business in (name) \_\_\_\_\_.

*(If more than one defendant is named in the complaint, attach an additional page providing the same information for each additional defendant.)*

**C. The Amount in Controversy**

The amount in controversy—the amount the plaintiff claims the defendant owes or the amount at stake—is more than \$75,000, not counting interest and costs of court, because (explain):

### III. Statement of Claim

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the damages or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

On (date) 05/01/2020, at (place) FOIAonline.gov (Note: Date mentioned is one of many FOIA Requests),

the defendant(s): (1) performed acts that a person of ordinary prudence in the same or similar circumstances would not have done; or (2) failed to perform acts that a person of ordinary prudence would have done under the same or similar circumstances because *(describe the acts or failures to act and why they were negligent)*

The Defendant failed to perform acts that a person of ordinary prudence would have done under the same or similar circumstances by not fulfilling numerous FOIA requests. The Plaintiff has good reason to believe that potentially one or more fake social media accounts were created under his name, which may be connected to the (preventable) Marines United Scandal. The Plaintiff is deeply concerned that numerous individuals may have senselessly been cyberbullied for years and the Plaintiff wants to ensure that however many victims/survivors there potentially are, all receive the legitimate truth, justice, and closure that we all deserve.

The acts or omissions caused or contributed to the cause of the plaintiff's injuries by *(explain)*

...genuine concerns caused years of emotional distress, unnecessary loss of wages, emotional harm to children, adversely impacted grades while attempting to earn a second graduate degree, loss of career opportunities, and distressed over the thought of potentially hundreds of individuals may have senselessly suffered severe psychological trauma, while others may have seriously considered claiming their own life, (assuming of course), none have tragically committed the act already, for entirely preventable reasons.

### IV. Relief

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages.

The Plaintiff is modestly requesting for all of his current/former FOIA requests to be immediately fulfilled by immediately releasing any and all related/unredacted information pertaining to any social media account that can currently and or previously be identified by using any combination of the Plaintiff's legal name (e.g. Darrell Bryce Davis), as well as any other potential account that has ever been considered/assumed to potentially be associated with the Plaintiff by the military, law enforcement, government, and Intelligence community. This information includes, but are not limited to, a complete and unredacted printout of any and all account(s) history of activity, photos, messaging, contact information, audios, videos, law enforcement/military/government related reports/documents, legal reports/documents, all military and non-military court records from every applicable district/court system, and any other related material within a week of a favourable decision for the Plaintiff. This lawsuit is not simply about one failure to fulfill one FOIA request, but rather all of them and the Plaintiff wants the FOIA requests to be completely fulfilled to the Plaintiff's satisfaction. Despite the Plaintiff's genuine concerns, it should be noted for the record that the Plaintiff has NOT created nor operated any social media account since deleting an old Facebook account back in 2012, aside from a former Youtube account, which is no longer active.

**V. Certification and Closing**

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

**A. For Parties Without an Attorney**

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: 07/19/2020

Signature of Plaintiff

Printed Name of Plaintiff

D. Bryce Davis

**B. For Attorneys**

Date of signing:

Signature of Attorney

Printed Name of Attorney

Bar Number

Name of Law Firm

Street Address

State and Zip Code

Telephone Number

E-mail Address